

**FILED UNDER SEAL REDACTED TO THE E-GOVERNMENT ACT OF 2002**  
**AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT**

I, Stacey Sullivan, being first duly sworn state:

1. I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation (FBI). I have been employed by the FBI as a Special Agent since October, 2008. As such, I am an “investigative or law enforcement officer of the United States” within the meaning of Title 18, United States Code, Section 2510(7). That is, I am an officer of the United States, who is empowered by law to conduct investigations regarding violations of United States law, to execute warrants issued under the authority of the United States, and to make arrests based on violations of the offenses enumerated in Title 18, United States Code, Sections 2251, 2252 and 2252A. In the course of my duties, I am responsible for investigating crimes which include, but are not limited to, child exploitation and child pornography. I have previously been involved in criminal investigations concerning violations of federal laws. Since joining the FBI, your affiant has received specialized training in human trafficking investigations, identifying and seizing electronic evidence, computer forensics, recovery, and social site investigations.

2. This affidavit supports an application for a criminal complaint charging JOHN MARTIN BOWEN with Distribution of Child Pornography in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

**FACTS AND CIRCUMSTANCES**

3. This affidavit is based upon information that I have gained from my investigation, my training and experience, as well as information gained from conversations with other law enforcement officers. Since this affidavit is being submitted for the limited purpose of securing a

criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that JOHN MARTIN BOWEN has committed a violation of Title 18, United States Code, Section 2252A(a)(2)(A).

### **STATUTORY AUTHORITY**

4. This investigation concerns an alleged violation of Title 18, United States Code, Section 2252A(a)(2) regarding distribution and receipt of child pornography and materials containing child pornography. Specifically, Title 18, United States Code, 2252A(a)(2) makes it a federal criminal offense to knowingly receive or distribute any child pornography or materials that contain child pornography that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

5. The term "computer," as used herein, is defined pursuant to Title 18, United States Code, Section 1030(e)(1), as "an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device."

### **FACTS AND CIRCUMSTANCES**

6. Between June 15, 2016 and June 17, 2016, your affiant, while working in an undercover capacity, accessed the Internet and connected to the Bittorrent network using a law enforcement client program, used to monitor the trafficking of child pornography occurring over Peer-to-Peer ("P2P") networks. Your affiant is familiar with P2P file-sharing networks and

programs, specifically the operation of the Bittorrent network. Your affiant focused the investigation on a device at IP address 108.26.81.116 because it was associated with files of investigative interest. Your affiant downloaded 38 files of suspected child pornography from the device at IP address 108.26.81.116. Your affiant viewed the completed files and confirmed that they were, in fact, child pornography. A sampling of the files downloaded from IP address 108.26.81.116 follows:

- a. A video named "pthc 9yo Jenny daughter tied up and dog licking her.avi". The two minute four second video depicts a nude pre-pubescent female laying on a purple towel with a knit hat pulled down over her eyes and her hands bound above her head with a yellow rope. Her legs are bound apart to the side while a dog licks her genitals.
- b. A video named "Dark Studio Mylola 2000-05 Lisa&Angy Part02.avi". This eight minute fifteen second video depicts two nude pubescent females lying nude on a bed. The females are engaging in oral sex and analingus. The camera exposes their genitals up close.
- c. An image named "5.jpg". This image depicts a pubescent female lying nude on a couch legs apart exposing her genitals. Writing superimposed on the picture reads [www.mylola.info](http://www.mylola.info).
- d. A video named "esp pthc Comendo A Menina Sem Do-2,59 Min-cum.mpg". This one minute fifty one second video depicts an adult male penetrating a nude pre-pubescent female in her vagina and her anus. The adult male ejaculates on her back then penetrates her anus with an object.
- e. A video named "Nablol Sucker [3.30m].avi". This video depicts a pre-pubescent female performing oral sex on an adult male. The video ends with the pre-pubescent female masturbating on a bed wearing red underwear.

7. During the downloading of the above files, your affiant confirmed all above-described child pornography files were downloaded from IP address 108.26.81.116.

8. On June 17, 2016, your affiant served an administrative subpoena was issued to Verizon for IP Address 108.26.81.116 for each of the dates and times your affiant downloaded child pornography files from the IP Address. The IP address for each of those download dates and times resolved back to JOHN BOWEN, [REDACTED] Keller VA.

9. On September 14, 2016, your affiant and a Virginia State Trooper conducted surveillance on BOWEN's residence and observed a 2012 four door silver Chevrolet bearing Virginia tag [REDACTED] parked next to the residence. The Virginia Department of Motor Vehicles showed the vehicle registered to JOHN MARTIN BOWEN, [REDACTED] Melfa, Virginia 23410.

10. On September 14, 2016, your affiant retrieved certified records from the Circuit Court of Accomack County, Virginia. These records reflect that on April 11, 2001, BOWEN was convicted of Aggravated Sexual Battery and Indecent Liberties with a Minor. BOWEN was sentenced to two years on each count, with all but six months suspended on each count. By virtue of this conviction, BOWEN is required to register as a sex offender. According to the Virginia State Police Sex Offender Registry website, BOWEN is current with his registration and his home address is [REDACTED], Melfa, Virginia, 23410.

11. Between September 29 and October 6, 2016, your affiant, while working in an undercover capacity, accessed the Internet and connected to the Bittorrent network using a law enforcement client program, used to monitor the trafficking of child pornography occurring over Peer-to-Peer ("P2P") networks. Your affiant focused the investigation on a device at IP address 71.176.3.228 because it was associated with files of investigative interest. Your affiant downloaded more than 300 files of suspected child erotica and child pornography from the device

at IP address 71.176.3.228. Your affiant viewed the completed files and confirmed that approximately 25 were, in fact, child pornography. A sampling of the files downloaded from IP address 71.176.3.228 follows:

a. A video named, “mylola-12yo Greta wants someone to lick her cunt.mpg”. This video depicts a pubescent female sitting on a sofa undressing. The female lays nude on her back exposing her genitals. There are several close-ups of her genitals throughout the video clip.

b. 370 images named “plump preteens on the beach”. This series of images depicts numerous females in various stages of undress on a beach. One image titled “Plumpy girl 0283.jpg” depicts a pubescent juvenile girl standing nude holding a towel around her waist. The towel is open in the front exposing her genitals.

12. During the downloading of the above files, your affiant confirmed all above-described child pornography files were downloaded from IP address 71.176.3.228.

13. On October 5, 2016, your affiant served an administrative subpoena was issued to Verizon for IP Address 71.176.3.228 for each of the dates and times your affiant downloaded child pornography files from the IP Address. The IP address for each of those download dates and times resolved back to JOHN BOWEN, [REDACTED] Keller VA.

### **CONCLUSION**

14. Based upon the facts set forth above, I submit that probable cause exists to believe JOHN MARTIN BOWEN has violated Title 18, United States Code, Section 2252A(a)(2)(A), which refers to any person who knowingly distributes any child pornography or materials that contain child pornography that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

FURTHER YOUR AFFIANT SAYETH NOT.

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Stacey A. Sullivan  
Special Agent  
FBI Child Exploitation Task Force  
Federal Bureau of Investigation

This affidavit has been reviewed for legal sufficiency by Assistant United States Attorney V. Kathleen Dougherty.

Reviewed: \_\_\_\_\_  
V. Kathleen Dougherty  
Assistant United States Attorney

Subscribed and sworn before me this      day of October, 2016, in the  
City of Norfolk, Virginia.

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The Honorable Lawrence R. Leonard  
United States Magistrate Judge